

May 29, 2025

Via CM/ECF

Honorable Evelyn Padin, U.S.D.J.
United States District Court
Martin Luther King Jr. Federal Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

**Re: Jessica Kratovil and Brian Rak v. Piscataway Township
Docket No. 2:24-cv-10661**

Dear Judge Padin:

Kindly accept this joint status letter in preparation for the Status Conference scheduled in this matter for Monday, June 2, 2025 at 12:00 PM.

This matter involves claims by homeowners against Piscataway Township related to improper drainage. Plaintiffs' claims against the Township are for dangerous condition/negligence, nuisance, trespass and inverse condemnation.

Pleadings. Plaintiffs filed their Complaint on October 22, 2024 in Middlesex County Superior Court. On November 21, 2024, the Township removed the case to this Court and, on December 6, 2024, filed its Answer. On March 4, 2025, the Township submitted a letter to the Court regarding its intent to file a motion to dismiss Plaintiffs' tort claims for their alleged failure to comply with the New Jersey Tort Claims Act. Plaintiffs submitted a responding letter and, on April 23, 2025, the Court conducted a telephone conference. At the conference, the Township consented to Plaintiffs filing an Amended Complaint containing allegations of notice provided to the Township of their tort claims. On May 21, 2025, Plaintiffs filed an Amended Complaint. On May 28, 2025, the Township filed an Answer. Prior to filing its Answer, on May 23, 2025, the Township submitted a letter to the Court regarding its intent to file a motion to dismiss Plaintiffs' tort claims.

Discovery. The parties exchanged Rule 26 Disclosures. They served written discovery requests and responded to written discovery requests. Per the February 5, 2025 Pretrial Scheduling Order, fact discovery shall be completed by July 31, 2025. The parties have additional fact discovery to conduct, but at this time it is unclear if an extension of the July 31, 2025 deadline will be needed. The parties request another status conference in July to address the status of ongoing discovery.

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Respectfully submitted,

WEIR LLP

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BY: _____
Jennifer Hiller Nimeroff, Esquire
Robert D. Sokolove, Esquire, *pro hac vice*

METHFESSEL & WERBEL PC

A handwritten signature in blue ink, appearing to read "William S. Bloom".

BY: _____
William S. Bloom, Esquire